

From: Jones, Peachie L.
Sent: Monday, October 31, 2022 12:41 PM
To: 'Elliot Shields'
Subject: Gursslin: Scheduling Depositions + End of Fact Discovery
Attachments: Extend Discovery for Depos.docx

Exhibit A

Elliot,

The fact discovery deadline in *Gursslin* is quickly approaching. I propose that we write to the Court asking for an extension of discovery so we may hold depositions. I would like to show (in the letter) that we have scheduled depositions and have a plan to complete discovery.

Thanks to the flu, I am now behind, so I would like to reschedule Plaintiff's deposition. I propose Mon Dec 5, Mon Dec 12, or Tue Dec 13. – Please let me know which works for you and your client.

You have multiple depositions to take of RPD officers. I have some days available in November if you would like to begin taking them in November. (Other deadlines make it hard for me to prepare to take a deposition on those days, but I can defend them.)

For example, how about the afternoons of Tue Nov 8 or Wed Nov 9 for Officers McClellan and Kent if they are available? You will be here already and I believe we anticipated those being short.

Other days: Tue Nov 29, Wed Nov 30, Fri Dec 9, Fri Dec 16, Mon Dec 19, Tue Dec 20, Wed Dec 21, and Wed Dec 28.

Please let me know about the (1) dates for the depositions, so I can see if/when the officers are available, and (2) proposed letter we send to the Court, which is attached.

Thank you,

Peachie L. Jones
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November 4, 2022

Hon. Mark W. Pederson
United States Magistrate Judge
100 State Street
Rochester, New York 14614

Re: Discovery Extension for Depositions
Gursslin v. City of Rochester et al., Case No. 20-cv-6508 (EAW)(MJP)

Dear Judge Pederson:

I represent the City of Rochester Defendants in the above matter.

Following a short stay of discovery in August and September 2022, the Court set November 7, 2022 as the Fact Discovery Deadline in this matter. The parties exchanged additional “paper discovery” during October 2022, but were unable to schedule depositions in the intervening period.

As such, the parties jointly request that the end of fact discovery be extended for depositions only. The parties have scheduled all necessary depositions and will take them as follows: 30(b)(6) deposition of Buffalo Police Department on November 1; Plaintiff Erin Gursslin on **Tuesday, December 5**; Rochester Police Department (“RPD”) Officer McClellan on **DATE**; RPD Officer Kent on **DATE**; former RPD Officer Springer on **DATE**; RPD Officer Nellist on **DATE**; and RPD Officer Kelly on **DATE**.

The parties thank the Court for its continued time and consideration in these matters.

Respectfully,

PEACHIE L. JONES
Municipal Attorney

CC: Elliot Shields, Plaintiff’s counsel

